

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

MEGAN FOX and BRIDGET MCMAHON,  
on behalf of themselves and all others  
similarly situated,

Plaintiffs,

v.

CHIPOTLE MEXICAN GRILL, INC., t/d/b/a  
CHIPOTLE,

Defendant.

CIVIL ACTION NO. 2:20-cv-01448-WSS

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO  
PLAINTIFFS' MOTION TO COMPEL DISCOVERY RESPONSES**

Defendant Chipotle Mexican Grill, Inc. hereby moves the Court, pursuant to Local Civil Rule 7 and Parts II.A. and II.C. of the Court's practices and procedures, for an extension of time to file a response to Plaintiffs' Motion to Compel Discovery Responses (Doc. 65). Pursuant to this Court's Second Case Management Order (Doc. 60), the deadline for Defendant's response to Plaintiffs' discovery motion is October 26, 2021. Defendant respectfully requests a six-day extension (from October 26, 2021, to Monday, November 1, 2021) to file its response to Plaintiffs' Motion to Compel Discovery Responses. There have been no previous requests to extend the time to respond to this motion, and the requested extension will not impact any other aspect of the case.

WHEREFORE, Defendant respectfully requests that the Court GRANT its motion and extend the deadline for Defendant's response to Plaintiffs' discovery motion as provided herein. Pursuant to Part II.A. of the Court's practices and procedures, undersigned counsel conferred with counsel for Plaintiffs, who consents to the relief requested in this motion, and a proposed form of order is filed contemporaneously herewith.

[Signature on Following Page.]

Dated: October 25, 2021

/s/ Robert J. Mollohan, Jr.

Elizabeth Bulat Turner (admitted *pro hac vice*)

Bar I.D. GA 558428

Robert J. Mollohan, Jr. (admitted *pro hac vice*)

Bar I.D. GA 984253

MARTENSON, HASBROUCK & SIMON LLP

2573 Apple Valley Road NE

Atlanta, GA 30319

Telephone: (404) 909-8100

bturner@martensonlaw.com

rmollohan@martensonlaw.com

-and-

Lindsey Conrad Kennedy

Bar I.D. PA 318318

Derek J. Illar

Bar I.D. PA 307492

ECKERT SEAMANS CHERIN & MELLOTT, LLC

600 Grant Street, 44th Floor

Pittsburgh, PA 15219

Telephone: (412) 566-2105

lkennedy@eckertseamans.com

dillar@eckertseamans.com

*Attorneys for Defendant Chipotle Mexican Grill, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 25, 2021 the foregoing **UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO PLAINTIFFS' MOTION TO COMPEL DISCOVERY RESPONSES** has been sent via ECF notice to Plaintiff's counsel:

Frank G. Salpietro, Esq.  
Rothman Gordon, P.C.  
310 Grant Street - Third Floor  
Pittsburgh, PA 15219  
(412) 338-1185 (telephone)  
(412) 246-1785 (facsimile)  
fgsalpietro@rothmangordon.com

/s/ Robert J. Mollohan, Jr.

Robert J. Mollohan, Jr.  
MARTENSON, HASBROUCK & SIMON LLP  
2573 Apple Valley Road NE  
Atlanta, GA 30319  
Telephone: (404) 909-8100  
rmollohan@martensonlaw.com